

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.

Plaintiff,

V.

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR

Defendants.

Civil Action No. 04-10353 PBS

**SCANSOFT, INC.'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS
AND RESPONSES TO INTERROGATORIES**

Plaintiff ScanSoft, Inc. (“ScanSoft”) hereby moves pursuant to Fed. R. Civ. P. 37 for an order compelling plaintiffs to produce documents responsive to ScanSoft’s First Set of Document Requests and to provide further responses to ScanSoft’s First Set of Interrogatories. The grounds for this motion are set forth in the accompanying Memorandum and exhibits hereto.

Accordingly, it is respectfully requested that this motion be granted. A proposed order is attached for the Court's convenience.

CERTIFICATE PURSUANT TO CIVIL LOCAL RULE 7.1

I hereby certify that on July 7, 2004, counsel for the parties conferred by telephone in an effort to resolve the issues presented in this motion, and that the parties were unable to reach an accord.

Dated: July 15, 2004

SCANSOFT, INC.,
By its attorneys,

s/ Lisa M. Fleming

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